Permit No. AS0000027

AUTHORIZATION TO DISCHARGE UNDER THE

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provision of the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et seq.; the "Act"),

VCS Samoa Packing Company
P.O. Box 957
Pago Pago, Tutuila
American Samoa 96799

is authorized to discharge tuna processing wastewater from the cannery located at Pago Pago, American Samoa from outfall Discharge Serial No. 001:

Latitude:	14 deg.	17 min.	01 sec.	S
Longitude:	170 deg.	40 min.	02 sec.	W

to receiving waters named: Pago Pago Harbor in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in Sections A through G hereof.

This permit shall become effective on 27 OCT 1992.

This permit and the authorization to discharge shall expire at midnight, 26 OCT 1997.

Signed this 24 day of SEPTEMBER.

For the Regional Administrator

Catherine Kuhlman for

Harry Seraydarian
Director
Water Management Division

A. EFFLUENT LIMITS AND MONITORING REQUIREMENTS

1. During the period beginning with the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from Outfall 001.

The effluent shall be sampled prior to its commingling with effluent from the other cannery.

Such discharges shall be limited and monitored by the permittee as specified below:[1]

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	30-DAY AVG.	DAILY MAX.	MEASUREMENT FREQUENCY	SAMPLE TYPE
FLOW (MGD)	--	0.72	CONTINUOUS	RECORDER
BIOCHEMICAL OXYGEN DEMAND (5-DAY)	[5]	[5]	TWICE/MONTH	COMPOSITE
SUSPENDED SOLIDS (lbs/day)	2304	5312	TWICE/WEEK	COMPOSITE
OIL AND GREASE (lbs/day)	538	1344	TWICE/WEEK	GRAB[2]
TOTAL PHOSPHORUS (lbs/day)	208	271	[3]	COMPOSITE
TOTAL NITROGEN (lbs/day)	800	1935	[3]	COMPOSITE
ACUTE TOXICITY	--	[4]	ONCE/6 MONTHS	COMPOSITE
TOTAL AMMONIA (mg/l)	--	133	ONCE/WEEK	COMPOSITE
TEMPERATURE (°F)	90	95	CONTINUOUS	CONTINUOUS
TOTAL CADMIUM (mg/l)	[5]	[5]	ONCE/6 MONTHS	COMPOSITE
TOTAL CHROMIUM (mg/l)	"	"	"	"
TOTAL LEAD (mg/l)	"	"	"	"
TOTAL MERCURY (mg/l)	"	"	"	"
TOTAL ZINC (mg/l)	"	"	"	"
pH	--	[6]	CONTINUOUS	CONTINUOUS

ATTACHMENT 1

NOTES:

(1) Where discharge monitoring data is reported as "below detection limit", both the detection limit obtained and the analytical method used shall be included on the monthly discharge monitoring report (DMR).

(2) Each oil and grease sample shall consist of four individual grab samples ("sub-samples") which shall be taken at even intervals during each production period in which samples are taken. Each sub-sample shall be separately analyzed and the mean value of the four sub-samples, shall be reported for daily maximum and monthly average.

(3) Permittee is required to sample twice/week on production days. Should the permittee wish to monitor the effluent on a non-production day(s), the permittee must monitor for the six consecutive days following the non-production day on which the first sample was taken. The average of all samples taken during that month will determine compliance with the "monthly average".

Should the canneries consistently comply with their TN and TP limitations and should the monitoring data show that the discharge is not impacting the water quality in the harbor or causing water quality violations for one year, the permit may be modified to incorporate a "weighted average" method of measuring compliance with the limitations. The numerical limitations themselves shall not be made any less stringent.

(4) See Section D "Toxicity" for monitoring requirements.

(5) No limit set at this time. Monitoring and reporting only.

(6) The pH is limited between 6.5 and 8.6 standard units. The total time during which the pH values are outside the required range of pH values shall not exceed 7 hours and 26 minutes in any calendar month; and no individual excursions from the range of pH values shall exceed 60 minutes.

B. DISCHARGE SPECIFICATIONS

Samples taken at monitoring stations 8, 8a, 14, 15, 16, 17 and 18 in the receiving water shall not reveal* any of the following in accordance with American Samoa Water Quality Standards:

1. Chlorophyll a levels in excess of 1.0 ug/l;

2. Light penetration depth less than 65 feet;

3. Objectionable color, odor, or taste, either alone or in

combinations, or in the biota;

4. Visible floating materials, grease, oil, scum, foam, and other floating material; and,

5. Materials that will produce visible turbidity or settle to form objectionable deposits.

Samples taken at monitoring stations 8, 8a, 15, 16, 17, 18 in the receiving water (those stations outside the zone of initial dilution (ZID)) shall not reveal* any of the following in accordance with American Samoa Water Quality Standards:

1. Dissolved oxygen (DO) concentration less than 5.0 mg/L; or 70% saturation;

2. Turbidity in excess of 0.75 nephelometric turbidity units; and,

3. Toxicity to aquatic life.

Samples taken at monitoring stations 15, 16, 17, and 18 in the receiving water (those stations outside the zone of mixing (ZOM)) shall not reveal* any of the following in accordance with American Samoa Water Quality Standards:

1. A temperature more than 1.5 degrees Fahrenheit from conditions that would occur naturally;

2. A level of total nitrogen in excess of 200 ug/l; and,

3. A level of total phosphorous in excess of 30 ug/l.

*Should any samples of ambient water reveal exceedances of the standards specified above and should ASEPA and/or USEPA determine that the canneries' discharge is the cause of the exceedance, the canneries may be required to undertake various actions including ceasing discharge and/or additional studies or monitoring to determine the cause of the exceedance. Violations of water quality standards shall be determined in accordance with American Samoa Water Quality Standards.

C. PROTECTED AND PROHIBITED USES

1. The protected uses of Pago Pago Harbor are as follows:

   a. Recreational and subsistence fishing;
   b. Boat-launching ramps and designated mooring areas;
   c. Subsistence food gathering, e.g. shellfish harvesting;
   d. Aesthetic enjoyment;
   e. Whole and limited body-contact recreation, e.g. swimming, snorkeling, surfing and scuba diving.
   f. Support and propagation of marine life;
   g. Industrial water supply;

3. Toxicity Reopener

Should any of the monitoring indicate that the discharge causes, has reasonable potential to cause, or contributes to an excursion above a water quality criteria, the permit may be reopened for the imposition of water quality-based limits and/or whole effluent toxicity limits. Also, this permit may be modified, in accordance with the requirements set forth at 40 CFR 122.44 and 124.14, to include appropriate conditions or limits to address demonstrated effluent toxicity, or to implement any EPA-approved new state water quality standards or testing methods applicable to effluent toxicity.

E. RECEIVING WATER QUALITY MONITORING PROGRAM

To determine compliance with water quality standards, the receiving water quality monitoring program must document water quality at the outfall, at areas near the zone of initial dilution (ZID) and zone of mixing (ZOM) boundaries, at areas beyond these zones where discharge impacts might reasonably be expected, and at reference/control areas. The permittee, cooperatively with Star-Kist, Inc., shall perform or cause to be performed, water quality monitoring at stations along the shoreline and offshore at regular frequencies as detailed below.

Should any monitoring or studies reveal, in the judgement of either ASEPA or EPA, that the water quality, coral reef, or overall biological health of the harbor is being impaired as a result of the new outfall discharge, either agency may at any time prohibit further discharge and/or require additional monitoring.

All water quality samples should be collected and processed according to the protocols found in EPA's guidance document entitled, Quality Assurance and Quality Control (QA/QC) for 301(h) Monitoring Programs: Guidance on Field and Laboratory Methods (EPA, 1987a). Monitoring reports shall be submitted to EPA on a quarterly basis.

Monitoring stations shall be designated and located as shown (also see Figures 1 and 2):

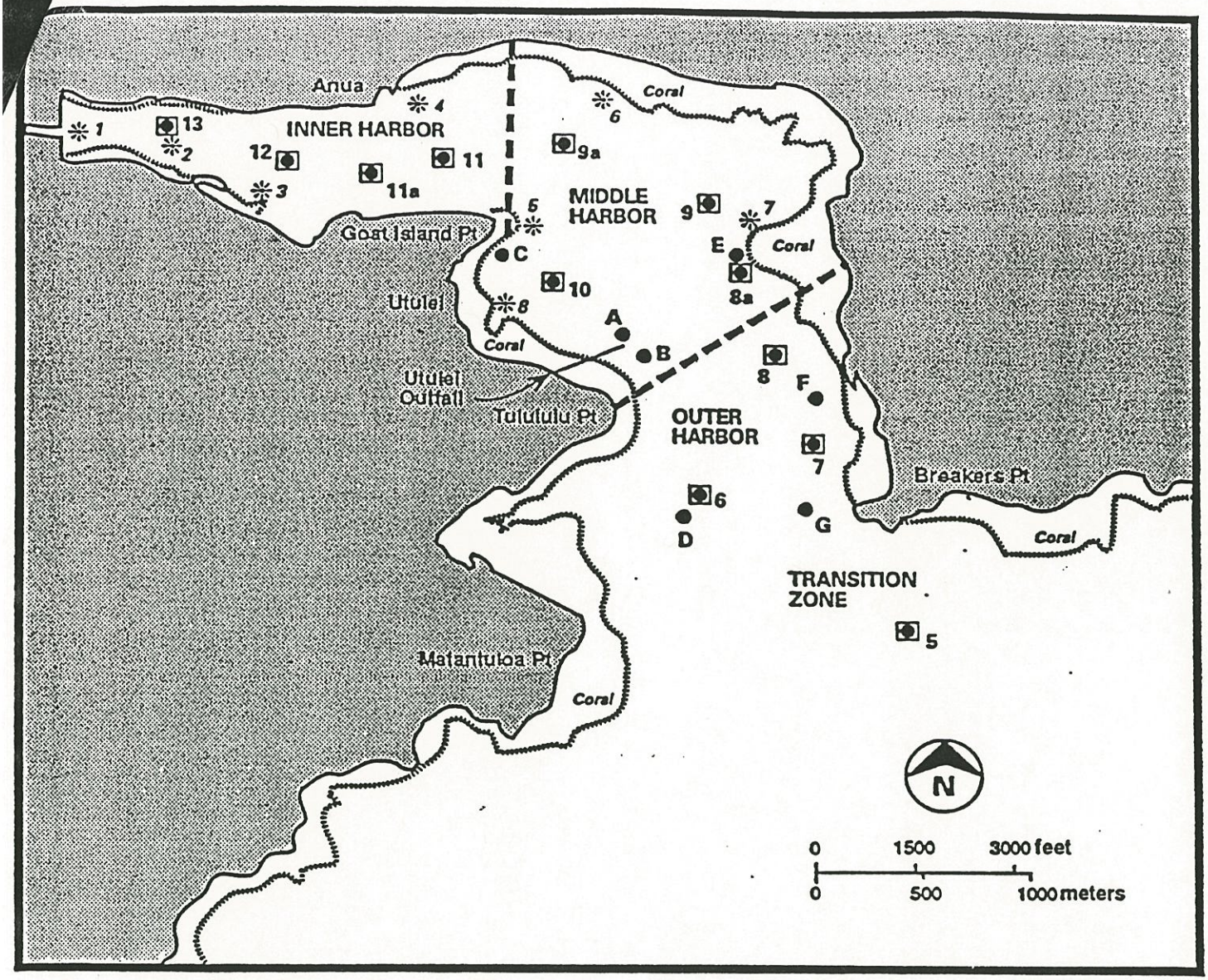
Offshore Station	Vicinity	Location	Coordinates Latitude	Longitude
5	Transition Zone		170° 39' .72W	14° 17' .88S
6	Outer harbor	Central	170° 40' .20W	14° 17' .52S
7	Outer harbor	East, South	170° 39' .93W	14° 17' .37S
8	Outer harbor	East	170° 40' .07W	14° 17' .17S
8a	Middle harbor	East	170° 40' .13W	14° 16' .88S
9	Middle harbor	East	170° 40' .18W	14° 16' .66S
9a	Middle harbor	East	170° 40' .57W	14° 16' .58S
10	Middle harbor	West	170° 40' .75W	14° 16' .87S
11	Inner harbor	Center, East	170° 40' .90W	14° 16' .58S
11a	Inner harbor	Center, East	170° 41' .13W	14° 16' .62S
12	Inner harbor	Center	170° 41' .33W	14° 16' .60S
13	Inner harbor	Center, West	170° 41' .71W	14° 16' .50S
14	Middle harbor	Diffuser	170° 40' .03W	14° 16' .58S
15	Middle harbor	ZOM Edge, North	170° 40' .12W	14° 16' .77S
16	Middle harbor	ZOM Edge, West	170° 40' .17W	14° 16' .56S
17	Middle harbor	ZOM Edge, East	170° 39' .91W	14° 16' .90S
18	Outer harbor	ZOM Edge, South	170° 40' .08W	14° 17' .10S

It is recommended that the stations be located using the sextant angle resection positioning method or a positioning system which affords an equivalent degree of accuracy and precision. Other means may be used if, in the judgment of ASEPA and EPA Region 9, they are of sufficient accuracy and precision to allow reoccupation of the stations within plus or minus six (6) meters.

The following shall constitute the Water Quality Monitoring Program as shown:

Parameter	Units	Sample Stations	Sample Type	Frequency
Temperature	°F	all	grab	monthly
pH		"	"	"
Dissolved Oxygen	mg/l	"	"	"
Suspended Solids	mg/l	"	"	"
Light Penetration	ft	"	"	"
Turbidity	NTU	"	"	"
Salinity	ppt	"	"	"
Chlorophyll a	ug/l	"	"	"
Total Nitrogen	ug/l	"	"	"
Total Phosphorus	ug/l	"	"	"
Total Ammonia	ug/l	"	"	"

Measurements should be taken at three depths for each location: 1 meter above the bottom, 1 meter below the surface, and at mid-depth.



LEGEND

- ASG Sampling Station
- Utulei WWTP Station
- CH2M HILL Field Measurement Station (1/19/91)

FIGURE 2. LOCATION OF WATER QUALITY STATIONS IN PAGO PAGO HARBOR

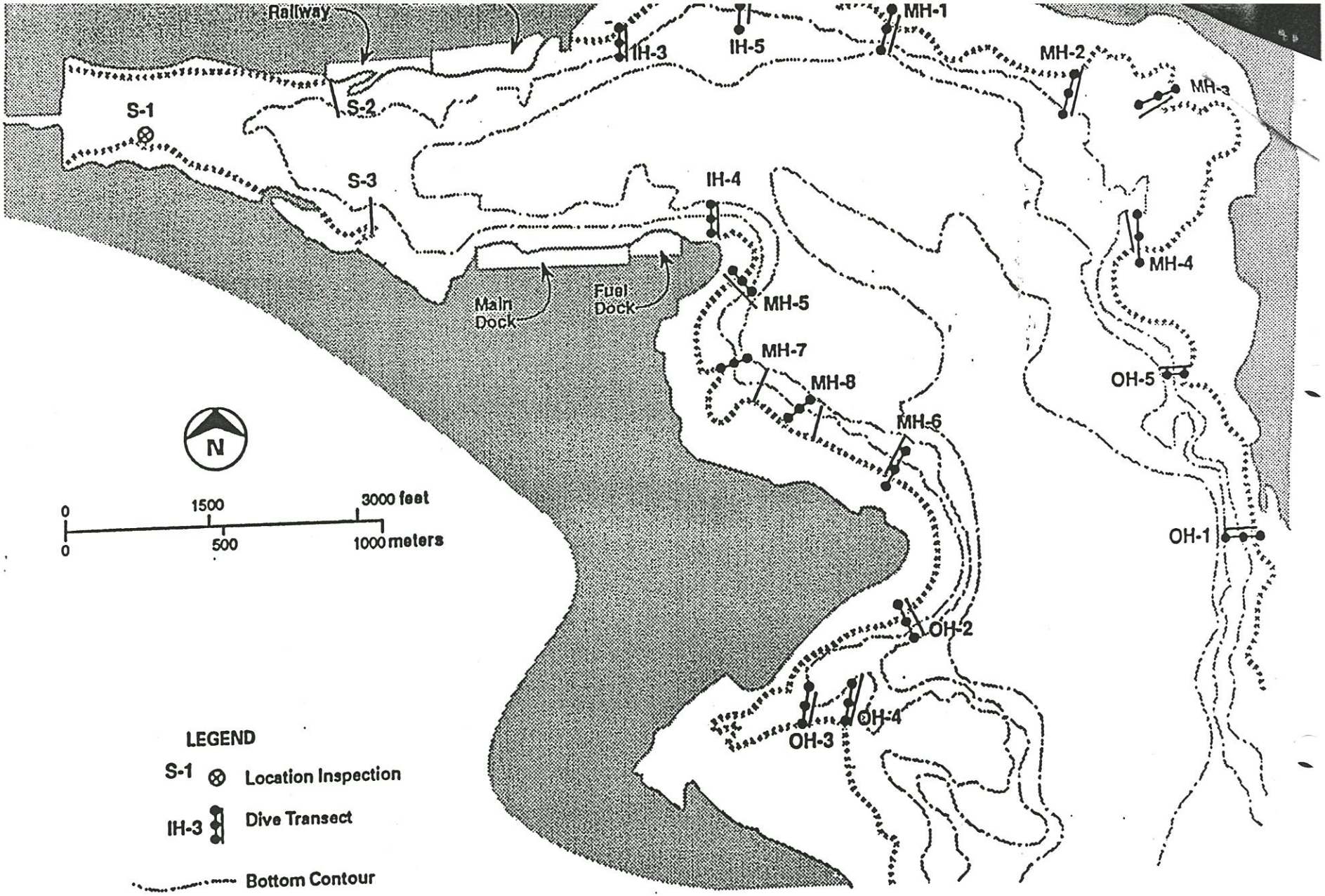


FIGURE 4-3

Coral Reef Transects from 1991 "Use Attainability Analysis", CH2M

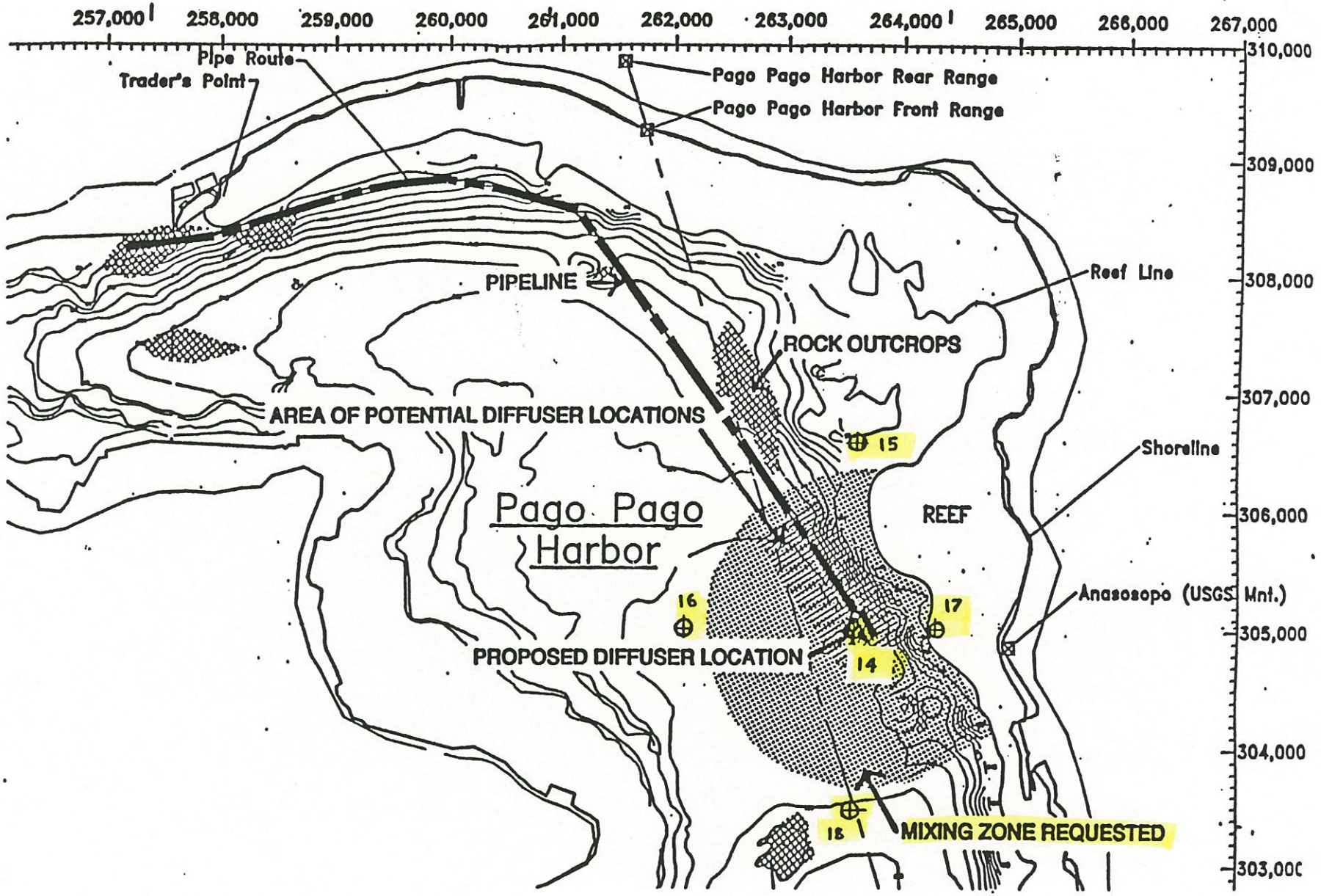


FIGURE 1. NEW MONITORING STATIONS IN PAGO PAGO HARBOR (14-18)